

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE §
KINGREY, and SANDRA McCOLLUM, §
individually and as heirs at law to the Estate of §
LARRY GENE McCOLLUM, §
PLAINTIFFS §
§
v. § CIVIL ACTION NO.
§ 3:12-cv-02037
§
BRAD LIVINGSTON, JEFF PRINGLE, §
RICHARD CLARK, KAREN TATE, §
SANDREA SANDERS, ROBERT EASON, the §
UNIVERSITY OF TEXAS MEDICAL §
BRANCH and the TEXAS DEPARTMENT OF §
CRIMINAL JUSTICE. §
DEFENDANTS §

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND TO
LIVINGSTON'S MOTION TO DISMISS**

Plaintiffs respectfully ask the Court to extend the deadline to respond to Defendant Livingston's Motion to Dismiss on the Basis of Qualified Immunity (Doc. 85) filed on September 6, 2013.

Pursuant to Local Rule CV-7.1(e), Plaintiff's response to the Motion to Dismiss is due September 27, 2013. Plaintiffs requests the response deadline be extended to October 4, 2013.

Pursuant to this Court's order of September 5, 2013, this case is not set for trial until April 2014. The deadline for dispositive motions is not until December 16, 2013. Granting this motion will not delay any proceedings.

The request is made for good cause, not to cause delay.

Dated: September 24, 2013.

Respectfully submitted,

The Edwards Law Firm
The Haehnel Building
1101 East 11th Street
Austin, TX 78702
Tel. 512-623-7727
Fax. 512-623-7729

By /s/ Scott Medlock
JEFF EDWARDS
State Bar No. 24014406
Lead Counsel

Scott Medlock
State Bar No. 24044783
Brian McGiverin
State Bar No. 24067760
James C. Harrington
State Bar No. 09048500

TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, TX 78741
(512) 474-5073 [phone]
(512) 474-0726 [fax]

Eliot Shavin
State Bar No. 18138200
2600 State Street
Dallas, Texas 75204
214-522-2010 (telephone)
214-720-9594 (fax)
Local Counsel

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Northern District of Texas.

CERTIFICATE OF CONFERENCE

By my signature above, I certify that I conferred with counsel for Defendant Livingston, Demetri Anastasiadis, and he is unopposed to this motion.